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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SCOTT FREEMAN, M.D., as TRUSTEE
FOR THE SCOTT MITCHELL FREEMAN
REVOCABLE LIVING TRUST, dated
March 10, 2012, for itself as assignee of
FERDINAND BELGA;

Plaintiffs,

vs.

STEPHEN HURST; SUNRAY ASSET
MANAGEMENT, INC.; NICO FORTE;
CERUVIA LIFESCIENCES f/k/a CH-TAC;
CAREY TURNBULL; RUSSELL
BURBANK, as liquidating trustee for
nominal defendants SAVANT ADDICTION
MEDICINE, LLC and SAVANT HWP
HOLDINGS, LLC; DOE INDIVIDUALS 1
through 20; and ROE CORPORATIONS 1
through 20,

Defendants.

and

SAVANT ADDICTION MEDICINE, LLC;
SAVANT HWP HOLDINGS, LLC; and
SAVANT HWP, INC.,

Nominal Defendants.

Case No.: 2:22-cv-01433-RFB-MDC

Consolidated with:

2:22-cv-01903-JCM-BNW

**STIPULATION AND PROPOSED ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANTS SAVANT ADDICTION
MEDICINE LLC AND SAVANT HWP
HOLDINGS, LLC TO RESPOND TO THE
SECOND AMENDED COMPLAINT**

1 Plaintiff SCOTT FREEMAN, M.D., as TRUSTEE FOR THE SCOTT MITCHELL FREEMAN
2 REVOCABLE LIVING TRUST, dated March 10, 2012, for itself as assignee of FERDINAND BELGA
3 (**Plaintiff**) and Defendants SAVANT ADDICTION MEDICINE, LLC and SAVANT HWP HOLDINGS,
4 LLC (collectively, **Defendants**), by their attorneys, hereby submit this Stipulation to extend the deadline
5 for Defendants to file the response to the Second Amended Complaint.

6 On December 6, 2023, Plaintiff filed a Second Amended Complaint in this action consisting of
7 1,271 paragraphs and 116 exhibits (ECF Nos. 141 through 145–50). Due to the length of the Second
8 Amended Complaint, the parties agreed that all defendants would have until February 2, 2024, to file
9 responses to the Second Amended Complaint, and the stipulation was adopted by the Court in the Second
10 Amended Joint Discovery Plan and Scheduling order. ECF No. 136.

11 Throughout the month of January, Defendants’ lead counsel suffered from a severe case of the flu
12 and pneumonia, which resulted in a multi-day hospitalization. These illnesses substantially impacted
13 counsel’s ability to perform legal work.

14 As a courtesy to counsel as a result of the above-described illness, the parties agree that
15 Defendants’ response to the Second Amended Complaint should be extended to February 9, 2024. The
16 parties stipulate to this extension in good faith and not to harass or cause undue delay.

17 The parties’ specific stipulations are as follows:

18 1. The deadline for Defendants SAVANT ADDICTION MEDICINE, LLC and SAVANT
19 HWP HOLDINGS, LLC to file a response to the Second Amended Complaint, currently set for February
20 2, 2024, should be extended to February 9, 2024.

DATED this 2nd day of February 2024

**LEWIS ROCA ROTHGERBER
CHRISTIE**

/s/ J. Christopher Jorgensen

Daniel F. Polsenberg,
Nevada Bar No. 2376
J. Christopher Jorgensen
Nevada Bar No. 5382
Abraham G. Smith
Nevada Bar No. 13250
3993 Howard Hughes Pkwy., Ste. 600
Las Vegas, NV 89169

Attorneys for Plaintiff

DATED this 2nd day of February 2024

TROUTMAN PEPPER HAMILTON SANDERS LLP

/s/ Brody R. Wight

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*Attorneys for Savant Addiction Medicine LLC and
Savant HWP Holdings, LLC.*

ORDER

IT IS HEREBY ORDERED the deadline for Defendants SAVANT ADDICTION MEDICINE, LLC and SAVANT HWP HOLDINGS, LLC to file a response to the Second Amended Complaint, currently set for February 2, 2024, should be extended to February 9, 2024.

JUDGE, UNITED STATES DISTRICT COURT

Dated: 2/6/2024

Respectfully submitted by:

TROUTMAN PEPPER HAMILTON SANDERS LLP

/s/ Brody R. Wight

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*Attorneys for Savant Addiction Medicine LLC
and Savant HWP Holdings, LLC.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of February 2024, I caused to be served a true and correct copy of the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND THE DEADLINE FOR DEFENDANTS SAVANT ADDICTION MEDICINE LLC AND SAVANT HWP HOLDINGS, LLC TO RESPOND TO THE SECOND AMENDED COMPLAINT**, in the following manner:

☒ **(ELECTRONIC SERVICE)** Pursuant to FRCP 5(b), the above referenced document was electronically filed on the date hereof with the Clerk of the Court for the United States District Court by using the Court's CM/ECF system and served through the Court's Notice of electronic filing system automatically generated to those parties registered on the Court's Master E-Service List.

☒ **(UNITED STATES MAIL)** By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, to the parties listed below at their last-known mailing addresses, on the date above written.

David S. Kupetz Sulmeyer Kupetz 333 South Hope Street Thirty-Fifth Floor Los Angeles, CA 90071-1406	Rory S. Miller Locke Lord LLP 300 S. Grand Ave. Suite 2600 Los Angeles, CA 90071
William C Mullen Locke Lord LLP 300 S. Grand Avenue Suite 2600 Los Angeles, CA 90071	

☐ **(PERSONAL SERVICE)** By causing to be personally delivered a copy of the above-referenced document to the person(s) listed below: N/A

☐ **(EMAIL)** By emailing a true and correct copy of the above-referenced document to the person(s) listed below: N/A

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

/s/ Carla Llarena
An employee of TROUTMAN PEPPER HAMILTON
SANDERS, LLP